

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

**GOVERNMENT'S MOTION FOR EXTENSION OF TIME TO FILE
RULE 404(b) and 609 NOTICE**

COMES NOW the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Dean R. Hoag and Michael A. Reilly, Assistant United States Attorneys for said District, and for its motion for extension of time to file its notice pursuant to Rule 404(b) and 609, states as follows:

1. The notices are due today.
2. The United States has expended substantial resources completing the notices, along with an extensive statement of the anticipated evidence in order to assist the Court and Defense Counsel to anticipate the evidentiary issues in the case.
3. The notices are substantially complete, but due to the scope of the conspiracy and the number of incidents involved, the United States requests leave to file its notices and supporting memorandum on or before Monday, December 11, 2017.
4. The United States filed its proposed jury instructions (Doc. # 130), and is in the process of preparing to file its expert notice. Both documents required extensive resources.

WHEREFORE, the United States requests leave of Court to file the aforementioned notices and memorandum on or before Monday, December 11, 2017.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Michael A. Reilly
DEAN R. HOAG, #23843MO
MICHAEL A. REILLY, #43908 MO
Assistant United States Attorneys
111 South 10th Street, Room 20.333
St. Louis, Missouri 63102
(314) 539-2200

CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2017, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

s/ Michael A. Reilly
DEAN R. HOAG, #23843MO
MICHAEL A. REILLY, #43908MO
Assistant United States Attorneys